

**To:** Brush, Jason[Brush.Jason@epa.gov]  
**From:** Sierra Club  
**Sent:** Tue 6/23/2015 2:48:29 AM  
**Subject:** Villages at Vigneto threatens Arizona

Jun 22, 2015

Mr. Jason Brush  
75 Hawthorne St  
San Francisco, CA 94105

Dear Mr. Brush,

Please revoke the permit for the proposed Villages at Vigneto development in southern Arizona. This mega-development, being proposed by El Dorado Benson, LLC, would threaten the San Pedro River and the wildlife and people who depend on it.

The proposed development would include nearly 28,000 new homes, commercial developments, golf courses, parks, vineyards, orchards, and resorts, as well as an extensive road and utility network. These developments alone would substantially alter the immediate and surrounding area. The potential 70,000 new residents the development is expected to attract would further threaten sensitive resources in the area, including the San Pedro River and wildlife species, and would substantially alter groundwater levels and associated surface flows.

A Clean Water Act Section 404 permit was previously issued to Whetstone Ranch. That permit should be revoked as the Villages at Vigneto is a different development proposal with substantially different and negative potential impacts. As such, it should be revoked pursuant to the Clean Water Act. The Environmental Protection Agency had previously objected to issuance of the 404 permit for Whetstone Ranch, stating that the development may result in substantial and unacceptable impacts to aquatic resources; it can be expected that this new proposal will result in even greater threats.

Impacts to listed species, such as the yellow-billed cuckoo and jaguar, must also be considered relative to this proposed development. Similarly, effects on migratory birds and other species that depend on this area for resources and for vital movement corridors must be addressed. The San Pedro River and the surrounding area provides important habitat for a wide diversity of species, and it may not be possible to mitigate potential impacts to these species. A portion of the proposed development is also within a modeled Arizona Wildlife Linkage; as such, it may cut off a critical movement corridor.

The amount of groundwater required for the proposed development far exceeds availability in the area. The required pumping would increase by more than 1100% compared to current pumping levels by the City of Benson. This is unacceptable and ill- advised in an area that receives less than 13 inches of rain per year and has been in a state-declared drought for 16 years. Potential effects of this increased pumping could be devastating.

It is vitally important for you to consider all of this and revoke this permit. Permits should not be authorized unless there are no impacts or if any impacts can be suitably mitigated. Given the extent of the proposed development and its likely effects, such permits should be denied and any current permits revoked.

Thank you for considering my comments.

Sincerely,

Mrs. Sarabeth Cullinan

**Ex. 6 - Personal Privacy**